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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

*Match Group, LLC, et al, v. Google LLC, et
al.*, Case No. 3:22-cv-02746-JD

Case No: 3:21-md-02981-JD

**DECLARATION OF MARKKU
IGNATIUS RE SUPERCCELL OY'S
STATEMENT IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED (ECF NO. 609)**

Judge: Hon. James Donato

1 I, Markku Ignatius, hereby declare as follows:

2 1. I have been employed by Supercell Oy (“Supercell”) since 2013. My current title
3 is General Counsel & Public Affairs. Among other responsibilities, I lead Supercell’s legal team.
4 I have personal knowledge of matters set forth in this declaration and, if called to testify as a
5 witness, would be competent to testify as follows.

6 2. I have been informed that Supercell Oy information has been submitted for filing
7 in this matter on Page 10, rows 21–25, of Plaintiffs’ Proposed Remedy Re Google’s Destruction
8 of Chat Evidence and pages 178–179 (deposition transcript pages) of Exhibit 27 to the Declaration
9 of Lauren A. Moskowitz, filed in *In re Google Play Store Antitrust Litigation*, No. 21-md-02981-
10 JD (N.D. Cal) (“MDL”) at ECF No. 608; in *In re Google Play Consumer Antitrust Litigation*, No.
11 3:20-cv-05761-JD (N.D. Cal) at ECF No. 459, in *State of Utah, et al. v. Google LLC et al.*, No.
12 3:21-cv-05227-JD (N.D. Cal.) at ECF No. 448, in *Match Group, LLC et al. v. Google LLC et al.*,
13 No. 3:22-cv-02746-JD (N.D. Cal.) at ECF No. 195; and in *Epic Games, Inc. v. Google LLC et al.*,
14 No. 3:20-cv-05671-JD (N.D. Cal.) at ECF No. 440.

15 3. I have reviewed Page 10, rows 21–25, of the two-page excerpt of Plaintiffs’
16 Proposed Remedy Re Google’s Destruction of Chat Evidence (“Plaintiffs’ Brief”) and the three-
17 page excerpt of Exhibit 27 to the Declaration of Lauren A. Moskowitz (“Moskowitz
18 Declaration”), which I understand were filed in this matter as described above at ECF No. 608.
19 The two-page excerpt of Plaintiffs brief that was provided to me and that I reviewed included text
20 highlighted on Page 10, rows 21–25, with certain other portions redacted. The three-page excerpt
21 of Exhibit 27 to the Moskowitz Declaration included a cover page titled “Exhibit 27” followed
22 by two pages, pages 178 and 179, from a deposition transcript. I understand that the information
23 in these excerpts is information that Plaintiffs in this action are seeking to file under seal. These
24 rows of the brief and deposition pages contain Supercell’s confidential information, including
25 information that reflects highly confidential/sensitive business information relating to Supercell’s
26 business relationship with Google and highly sensitive financial information, that Supercell keeps
27 confidential in the ordinary course of its business. Supercell views this information as
28 confidential and sensitive business and financial information, has not made it public (nor is it

1 public, to Supercell's knowledge), and the disclosure of this information is likely to result in
2 competitive or commercial disadvantage to Supercell. If these portions of the brief and deposition
3 transcript were to be made public, Defendants' competitors (for example, platforms operated by
4 third parties competitive with Defendants where Supercell offers its games) could glean
5 information about Supercell's business relationship with Defendants and use this information in
6 negotiations with Supercell to gain a competitive advantage at Supercell's expense. Disclosure of
7 this information would also likely harm Supercell by harming its bargaining position with third
8 party platforms, and could give its competitors the ability to undercut Supercell and unfairly win
9 additional business.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed on September 28, 2023.

13
14 /s/Markku Ignatius
Markku Ignatius

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Ciara McHale, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct. Executed on September 28, 2023.

/s/ Ciara McHale
Ciara McHale